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**CONESTOGA-ROVERS  
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Reference No. 056394

Mr. Sam Chummar  
Remedial Project Manager  
U.S. Environmental Protection Agency - Region V  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

Dear Mr. Chummar:

Re: Monthly Progress Report - May 2010  
Former Plainwell, Inc. Mill Property Operable Unit No. 7  
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site  
Allegan and Kalamazoo County

As required by Task 8, Progress Reports in the Statement of Work of the Remedial Investigation and Feasibility Study (RI/FS) at the former Plainwell, Inc. Mill Property, please find attached three copies of the Progress Report No. 43 for the period of May 1, 2010 through May 31, 2010.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

CONESTOGA-ROVERS &amp; ASSOCIATES

Jennifer L. Quigley, P.E.

LKC/cr/1/Lan.

Encl.

cc: Paul Bucholtz (MDNRE) - three hard copies  
Jim Saric (U.S. EPA) - electronic only  
Erik Wilson (City of Plainwell) - electronic only  
Richard Gay (Weyerhaeuser) - electronic only  
Joe Jackowski (Weyerhaeuser) - electronic only  
Martin Lebo (Weyerhaeuser) - electronic only  
Michael Erikson (Arcadis) - electronic only  
Dawn Penniman (Arcadis) - electronic only  
Garry Griffith (Georgia-Pacific, LLC) - electronic only  
Jeffery Lifka (Tetra Tech) - electronic only  
Gregory Carli (CRA) - electronic only  
Jodie Dembowski (CRA) - electronic only

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**ISO 9001**  
ENGINEERING DESIGN

**Progress Report No. 43  
May 1, 2010 to May 31, 2010**

**Remedial Investigation and Feasibility Study  
Former Plainwell, Inc. Mill Property  
Plainwell, Michigan**

This progress report is being submitted to the United States Environmental Protection Agency (U.S. EPA) in accordance with Task 8: Progress Reports and the Schedule for Major Deliverables contained in the Statement of Work for the Remedial Investigation/Feasibility Study (RI/FS), pursuant to the terms of the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit No. 4 and the Plainwell, Inc. Mill Property (Site) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Consent Decree), which became effective February 22, 2005.

**1. Work Performed**

- CRA mobilized to the Site on May 17, 2010 to implement the supplemental Phase II RI sampling activities consisting of investigation activities within the former Mill Buildings, Area 3A (former Sludge Dewatering and Quality Products Buildings) and Area 3B (former Specialty Minerals Building). Work completed during the reporting period under this scope of work included the following:
  - Completion of the coring of concrete flooring for the purposes of soil boring installation within the former Sludge Dewatering Building, former Specialty Minerals Building, and Mill Buildings
  - Completion of test pits and soil borings in Areas 3A and 3B and collection of associated samples for laboratory analysis
  - Completion of exterior test pits and soil borings in the vicinity of the former Mill Buildings and collection of associated samples for laboratory analysis
  - Initiation of soil boring installation activities within the former Mill Buildings and the collection of associated soil samples for laboratory analysis

**2. Data Received**

- Portions of the data from the Phase II RI sampling activities conducted in January / February 2010 have been received and is currently undergoing quality assurance/quality control validation. The data will be tabulated and provided in future progress reports once this process is complete.

**3. Modifications to Work Plans or Other Schedules  
Proposed to, or Approved by, the U.S. EPA**

- A letter responding to U.S. EPA's conditional approval of the Sampling and Analysis Plan (SAP) for the proposed soil sampling within the former Mill Buildings, Area 3A (former Sludge Dewatering and Quality Products Buildings) and Area 3B (former Specialty Minerals Building) was submitted to the U.S. EPA on May 14, 2010. The letter provided responses to U.S. EPA's May 13, 2010 comments to identify how the comments had been addressed by

Weyerhaeuser and included updated figures and tables showing the final scope of work for the sampling activities.

- Revision 03, Addendum 05 to the Multi-Area Quality Assurance Project Plan (QAPP) for the work related to the 12th Street Landfill and Site was submitted to U.S. EPA on May 13, 2010 for approval. The scope of the QAPP addendum included the following:
  - Updating the QAPP to identify changes in the CRA project team addressing changes in project personnel
  - The addition of Columbia Analytical Services (CAS) to complete the full suite of analytical parameters for the various media included in the project. In the current version of the QAPP (Revision 03, Addendum 04), CAS is only able to conduct analysis for selected parameters, which the primary laboratory, Weyerhaeuser Analytical Testing Services (WATS), does not have the facilities to complete. The addendum would allow CAS to complete all of the analysis required by the project, providing the project team the flexibility to manage the demand on each laboratory and ensure turnaround times on analytical data reporting meet project requirements.

#### **4. Problems Encountered and Planned Resolution**

- Given the nature of the sampling activities within the former Mill Buildings, it was not possible to install all of the proposed soil borings in the anticipated locations. Some changes to the scope of the sampling were required due to unforeseen circumstances such as areas being inaccessible, the presence of concrete sub-basements or vaults, refusals, and the movement of sampling points to be more reflective of potential releases based on actual Site conditions encountered in the field. Based on the conditions encountered in the field, six soil borings proposed within the former Mill Buildings could not be completed. One additional proposed soil boring was eliminated from within the former Sludge Dewatering Building; however, an additional soil boring was added on the eastern side of the former Sludge Dewatering Building. All revisions in scope identified above were reviewed with the U.S. EPA oversight representatives (Bethany Hand and Cheryl Gorman) for concurrence prior to implementation. A memorandum is currently under development to document the revisions in scope.

#### **5. Work Anticipated During the Next Reporting Period**

- Completion of the former Mill Buildings, Area 3A and Area 3B sampling activities, including the following:
  - Completion of the soil borings within the former Mill Buildings
  - Collection of groundwater samples from soil borings within the Mill Buildings
  - Surveying of test pit and soil boring locations installed during the May/June investigation activities
  - Completion of an inventory of investigation derived waste (IDW) for appropriate characterization and disposal
  - Collection and laboratory analysis of a waste characterization sample from the liquid IDW
  - Discharge of the liquid IDW to the City of Plainwell's Water Renewal Plant, under approval from the City of Plainwell
- Submittal of memorandum summarizing the changes to the scope of work for the former Mill Buildings, Areas 3A, and Areas 3B

**6. Anticipated Development with Work during the Next Period**

- Upon receipt of data for Area 3A, initiate discussions with U.S. EPA and the City of Plainwell regarding the City's proposed use of this portion of the Site for a new public safety complex.

**7. Other Relevant Information**

- None.